## REMARKS

Claims 1 – 4, 9 – 14, 16 – 19 and 21 - 32 are pending in the present application. Claims 5 – 8, 15 and 20 were previously canceled.

On page 2 of the Office Action, claims 1, 2, 4, 9, 10, 12 – 14, 16 – 19, 21 – 26 and 28 – 32 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,724,577 to Exley et al. (hereinafter "the Exley et al. patent") in view of U.S. Patent Application Publication No. 2002/0046224 to Bendik (hereinafter "the Bendik publication"). Applicant is traversing this rejection.

Claim 1 provides for a system that includes, *inter alia*, a module that provides a key that includes (1) a unique identifier of a datum, and (2) an additional attribute of said datum other than its content.

The Exley et al. patent discloses a key that is a unique identifier of a data element in a hierarchical outline (col. 2, lines 10 – 11). The Exley et al. patent explains that a key field serves to link a hierarchical data base and a relational data base (col. 3, lines 21 - 22). The Exley et al. patent also discloses that the relational data base includes a column for storing the key, and additional columns for storing additional attributes (col. 2, lines 25 – 27).

The Office Action, on page 3, recognizes that the Exley et al. patent does not explicitly teach a key that also includes an additional attribute, and so, introduces the Bendik publication. The Office Action then asserts that it would be obvious to combine the teachings of the Exley et al. patent and the Bendik publication.

However, since, in the Exley et al. patent expressly teaches that the additional attributes are stored in the relational database, and that the key provides a link to the relational database, the Exley et al. patent does not suggest a motive to include the additional attribute in the key.

Moreover, <u>if the key were modified to include the attributes therein</u>, rather than in the relational data base table, the system in the Exley et al. patent would <u>not need for the key to provide a linkage to the attributes in the relational data base table</u>, as is described in the Exley et al. patent. Therefore, a modification of the Exley et al. patent to include an additional attribute in the key would **change the principle of operation** of the system of the Exley et al. patent. Accordingly, the Exley et al. patent **cannot serve as a basis for a section 103(a) rejection** of claim 1.

Nevertheless, the Office Action suggests that the Bendik publication, in paragraphs 0007 and 0015, discloses a key in which an additional attribute is encoded into a unique identifier. Applicant respectfully disagrees.

The Bendik publication paragraph 0007 does not mention a key, but instead states:

> The present invention provides a computer implemented method for managing documents including the steps of creating a document profile that includes fields of attributes of a document and generating a unique identifier corresponding to the document (that is, corresponding preferably to the document profile and the associated document content). The <u>unique identifier includes</u> at least <u>a first portion</u> including information descriptive of an attribute of the document and at least <u>a second portion</u> including an automatically generated number. The method preferably further includes the step of storing the document profile for the document. In one embodiment the first portion is descriptive of the author of the document. The second portion is preferably a sequentially generated number that is unique for the first portion. That is, there may be many documents having the same first portion (for example, the initials of the author), but each document identifier having the first portion preferably has a unique number for the first portion. (Emphasis added)

Thus, paragraph 0007 does not disclose a key having a unique identifier and an additional attribute, but instead, discloses that a unique identifier includes a first portion and a second portion.

The Bendik publication paragraph 0015 also does not mention a key, but instead states:

> The present invention also provides a computer implemented document management system including a module to create a document profile to be stored in a database in the storage device and, for example, a module to

> generate a unique identifier for the document. <u>The unique identifier</u> preferably
> <u>includes</u> at least <u>a first portion</u> including information descriptive of an attribute
> of the document and at least <u>a second portion</u> including a number generated by
> the unique identifier generation module. (Emphasis added)

Thus, paragraph 0015 does not disclose a key having a unique identifier and an additional attribute, but

instead, discloses that a unique identifier includes a first portion and a second portion.

Applicant respectfully submits that although the Bendik publication <u>discloses that a unique</u>

<u>identifier includes a first portion and a second portion</u>, the Bendik publication <u>does not disclose a key</u>

<u>that includes</u> (1) <u>a unique identifier</u> of a datum, and (2) <u>an additional attribute</u> of said datum other than

its content. Therefore, Applicant further submits that the cited combination of the Exley et al. patent

and the Bendik publication does not disclose **a key** that includes (1) **a unique identifier** of a datum,

and (2) **an additional attribute** of said datum other than its content, as recited in claim 1.

<u>In summary, with respect to the rejection of claim 1</u>:

(A)    the Exley et al. patent does not suggest a motive to include an additional attribute in the key;

(B)    a modification of the Exley et al. patent to include an additional attribute in the key would change

the principle of operation of the system of the Exley et al. patent, and so, the Exley et al. patent

cannot serve as a basis for a section 103(a) rejection of claim 1; and

(C)    the cited combination of the Exley et al. patent and the Bendik publication does not disclose a

key that includes (1) a unique identifier of a datum, and (2) an additional attribute of said datum

other than its content, as recited in claim 1.

In view of the several reasons provided above, Applicant submits that claim 1 is patentable over

the cited combination of the Exley et al. patent and the Bendik publication.

Independent claims 9 and 16 each includes recitals similar to those of claim 1, as described above.

Thus, claims 9 and 16, for reasoning similar to that provided in support of claim 1, are also patentable over

the cited combination of the Exley et al. patent and the Bendik publication.

Claims 2, 4 depend from claim 1. Claims 10 and 12 – 14 depend from claim 9. Claims 17 – 19 depend from claim 16. Claims 21 - 25 depend from claim 1. Claim 26 depends from claim 9. Claims 28 and 29 depend from claim 16. By virtue of these dependencies, claims 2, 4, 10, 12 – 14, 17 – 19, 21 – 26, 28 and 29 are also patentable over the cited combination of the Exley et al. patent and the Bendik publication.

Claims 30 - 32 are independent, and each recites, *inter alia*, a key that includes (1) a unique identifier of a first datum, and (2) an additional attribute. Thus, claims 30 - 32 each includes recitals similar to those of claim 1 described above. Accordingly, for reasoning similar to that provided above in support of claim 1, Applicant submits that claims 30 - 32 are patentable over the cited combination of the Exley et al. patent and the Bendik publication.

Applicant respectfully requests reconsideration and withdrawal of the section 103(a) rejection of claims 1, 2, 4, 9, 10, 12 – 14, 16 – 19, 21 – 26 and 28 – 32.
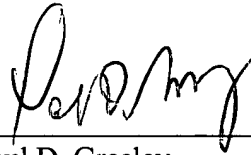
On page 6 of the Office Action, claims 3, 11 and 17 are rejected under 35 U.S.C. 103(a) as being unpatentable over The Exley et al. patent and the Bendik publication, in view of U.S. Patent Application Publication No. 2002/0016922 to Richards et al. (hereinafter "the Richards et al. publication"). Applicant is traversing this rejection.

Claim 3 depends from claim 1. Claim 11 depends from claim 9. Claim 17 depends from claim 16. Above, Applicant explained that claims 1, 9 and 16 are patentable over the cited combination of the Exley et al. patent and the Bendik publication. Applicant submits that the Richards et al. publication does not make up for the deficiencies of the Exley et al. patent and the Bendik publication, as the Exley et al. patent and the Bendik publication relate to claims 1, 9 and 16. Accordingly, Applicant further submits that claims 1, 9 and 16, and claims 3, 11 and 17, by virtue of their dependencies, are all patentable over the cited combination of the Exley et al. patent, and the Bendik and Richards et al. publications.

Applicant respectfully requests reconsideration and withdrawal of the section 103(a) rejection of claims 3, 11 and 27.

In view of the foregoing, Applicant respectfully submits that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicant respectfully requests favorable consideration and that this application be passed to allowance.

Respectfully submitted,

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